

Clayton Johnson  
Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

Clayton Johnson  
PO Box 31  
Jensen, UT 84035

Vernal Field Office  
170 S. 500 E.  
Vernal, Utah 84078

21 July 2017

RECEIVED

JUL 21 2017

BLM VERNAL UT

RE: Comments on Proposed Lease Sale; Green River District, Vernal Field Office, Duchesne and Uintah Counties, Utah (Vernal December 2017 Oil and Gas Lease Sale), Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA,

The following are my comments on the Draft Proposed December 2017 Oil & Gas Lease Sale EA (DOI-BLM-UT-GO10-2017-0028-EA).

1. Procedural Concern.

- a. Appendix F (on-site lease photos) is appreciated, but in the future, please identify a photo point and a view direction for reference. See 1b for reasons.
- b. In the above regard, as someone familiar with some of these lease areas, I note that several of the site photos could, intentionally or not, be deceptive. For example, UT1217-071 is a view more or less east along the Sunshine Bench road, within a lease area that includes approximately the SW half of Sec 6, T5S R23E SL. The Sunshine Bench Road runs southeasterly on top of the bench, down in the S2SW of Sec 6. Most of the land area within this proposed lease, further north and east, drops off into Brush Creek, a scenic little canyon farm & residential area, which looks vastly different than the terrain shown in the photo. A well location along the Sunshine Bench Road as depicted in the photo is unlikely to impact residents or DINO (Dinosaur National Monument) visitors, who frequently use the Brush Creek Road. A well location further northeast within this lease, overlooking or within Brush Creek canyon, would impact residents & visitors. Other examples include several leases with boundaries shown at or within the Green River flood plain, for which the photos show no

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

sign of the river/riparian area. Again, well location would be the essence of any problem, but the photos don't adequately illuminate the potential for impacts. I realize that in some cases, multiple photos, from several photo points, might be necessary to accurately characterize the lease proposal. Digital photos are cheap and easy, and would improve understanding of lease proposals.

- c. I note that one of your photos, UT1217-070 (Escalante Ranch/DINO), is a good job of characterizing that proposed lease area and the Green River (the DINO boundary) from within the DINO, south of the Visitor Center.

2. Potential Lease conflicts with DINO visuals (Spring-Fall) and Wildlife/Bird populations (Winter). Proposed Leases UT1217-069 and UT1217-070.

- a. Proposed Lease UT1217-069 borders the DINO boundary in T4S R23E SL Sec 28 & 33. Although this area is some distance from the Dino Visitor Center, the Dino boundary here is only about ¼ mile west of "Orchid Draw", a quite scenic little draw and hiking area. Any well location in Sec 23 or Sec 33 would need careful consideration to avoid visual impacts to the VRM Class II area.
- b. Proposed Lease UT1217-070, T4S R23E SL Sec 34/part (Escalante Ranch/DINO). Development on this lease would have obvious visual impacts to the experience of DINO visitors, not just at the Visitor Center, but along more than three miles of the south-facing slope within DINO, including Rock Art sites. Most DINO visitation occurs Spring-Fall, but there are some Winter visitors (including campers). During the Winters (late Fall through early Spring), game animals and other wildlife depend on the proposed lease area and surrounds. Since this proposed lease is within the area of the Jensen Circle of the annual Audubon Christmas Bird Count, I know first-hand the variety of wildlife depending in winter on the DINO/Green River/Escalante Ranch area. In addition to Deer, Elk, and antelope, Bald eagles, waterfowl, and other bird species winter on the

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

Escalante Ranch. In some years, vast flocks of Sandhill cranes spend the winter here. Thus, development of this proposed lease at any time of year would impact the National Monument experience, and potentially impact Wildlife (including waterfowl/migratory birds) during a stressful part of the year. For the above reasons, I believe this lease should be withdrawn from the sale. I have a personal interest in this; we live nearby and frequent the monument throughout the year, chiefly for birdwatching, photography, rock art, scenery, hiking, and canoeing.

3. Concerns regarding Leases along/adjacent to the Green River.

- a. Regarding the "100 year flood plain" management criterion. This EA contains an excellent, well-phrased summary statement on climate change & the effects (Sec 3.3.4, para 3): "Broadly stated, the effects of climate change observed to date and projected to occur in the future include more frequent and intense heat waves, longer fire seasons and more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, greater sea-level rise, more intense storms, harm to water resources, harm to agriculture, ocean acidification, and harm to wildlife and ecosystems". Given that parts of the Western USA are already experiencing repeated flooding at and beyond 100 year flood levels, I suggest it would be wise to proactively base management where possible on 500 year flood plains, rather than 100 year flood plains.
- b. Four of the proposed lease sales border on the Green River (or in it according to some of your maps...GIS/map problem?). I am especially concerned about these leases for many reasons, including but not limited to: visuals, water quality, wildlife, riparian quality, recreation. Recreation values, specifically river use by small boats (small fishing boats, canoes, and various other one-3-person craft propelled by paddle or by small motor) seems to have been ignored for these

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

leases (see further discussion under [7] below). Based on your data, here are comments by lease:

- i. UT1217-044: 9S 19E SL Sec 14 (Pariette Wetlands area). Your map shows this the lease as including a high water channel of the Green River on its east boundary, is this a GIS/map overlay error, or is the lease boundary actually in the river? Your photo appears to have been taken from nearly river level in Sec 14; infrastructure in this location would be highly visible from the river. Will your stipulation UT-5-117 (in force below Ouray) negate using the pictured location for infrastructure? A special concern not addressed for this lease is river recreation (see 3b above & 7 below).
- ii. UT1217-054: 6S 21E SL, NENW sec 14, & also S/2 private adjacent to river, photo presumably facing E? My main concern here is river recreation (see 3b above & 7 below). I cannot identify the point from which your photo was taken, but it appears that infrastructure close to the rim shown would be visible for a long way from the river; when examining any proposed well locations, please try to avoid having infrastructure visible from river level.
- iii. UT1217-055: 7S 21E SL SE Sec 20. Your photo for this proposed lease photo is an example of the concern I discussed in 1b above. Your photo has no indication of the Green River, which should be visible to the north, west, and south from the Sec 20 lease portion; was the photo taken in Sec 20, or in Sec 14-15? Your lease area/map overlay suggests that the south edge of UT1217-055 in Sec 20 is on the edge of riparian, and infrastructure in the S2SE Sec 20 would be visible from river for some distance. When examining any proposed well locations, please try to avoid having infrastructure visible from river level (see 3b above & 7 below).
- iv. UT1217-065: 6S 22E SL, Sec 14 & 15. Your photo for this proposed lease exemplifies my concerns outlined in 1b & 3b above. The photo, taken

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

from a main highway, in no way represents the complex terrain & features present within the lease area. From your lease area/map overlay, it appears that only very careful siting would prevent infrastructure/development in Sec 15 or in the SW of Sec 14 from impacting the river visually and/or physically. I realize the situation may not appear this grim on the ground, but surely the purpose of maps and photos in an EA is to accurately convey the situation? When examining any proposed well locations, please try to avoid having infrastructure visible from river level (see 3b above & 7 below).

- c. River recreation (further discussed in 7 below) does occur along the entire length of the Green River, including below DINO and above Ouray, albeit some river segments do not currently receive as much visitation as others. The history of river recreation suggests it would be wise to consider water recreation any time a navigable stream or river is involved. I suggest that you should be thinking in terms of UT-S-117-like stipulations everywhere along the Green River.
4. Potential ACEC conflict. Proposed Lease UT1217-085 includes Secs 23, 24, 25 & 26, T7S R25E SL. Section 25 is adjacent on the east to a Colorado ACEC (Raven Ridge, administered by the WRFO); This EA discusses ACECs in Sec 3.3.2. I don't see the Raven Ridge ACEC mentioned in the EA. It seems unlikely that the values and concerns which drive designation & management of an ACEC would simply terminate at an invisible State boundary. Raven Ridge is a SE-NW trending, lengthy, elevated landform quite different from the surrounding flats; habitat that can be very important in this harsh, dry, country. It appears to be one of the few places in Northern Utah to find Scott's oriole, for instance. I would expect that Raven Ridge is important habitat for both local wildlife and endemic plant populations? I note you intend to coordinate with Colorado the WRFO on this one. Did you reach out to potentially concerned Colorado publics? I note both two small parcels of apparently private land in Section 25, and a State section

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

(sec 36) in the mix here. Have you coordinated with the State of Utah and the landowner? Would it be wise management, based on the values & concerns that led to designation of the area within Colorado, to at a minimum exclude from the lease a wildlife corridor through Sections 23 & 25, allowing a continuity of undisturbed wildlife and plant habitat/access along this ridge and into the "breaks" to the northwest?

5. Visual Concerns Along Highway 44 near Steinaker Lake State Park. Proposed lease UT1217-049 is east across Highway 44 from Steinaker Reservoir & State Park (T3S R21E SL). The EA identifies "10 acres of BLM Surface and 30 acres of private Surface that are visible from the Park entrance, and are flat enough to allow development of well pads". The EA fails to mention that Highway 44 between Vernal and Flaming Gorge is a Scenic Byway which draws visitors from around the world, and includes along this area, the "Drive Through the Ages" interpretive geological route, which highlights the age, nature, and fossils of the various geologic formations visible from the highway. Considering the above, I suggest that the visual impact of development on either the 10 acre or the 30 acre parcels mentioned would be considerably greater than stated in the EA.
6. Concern Regarding Development of the leases discussed above. I read the list of stipulations, which seems quite thorough. However, personal experience in various phases of the leasing/development process indicates that once a lease is obtained, considerable pressure can be brought to bear during lease development, in selection of the actual location/access footprint, and to "adjust" (loosen) various stipulations through Exceptions, Modifications, and Waivers. That process that is not always subject to public scrutiny. I strongly urge you to resist such efforts, especially along the length of the Green River, and especially where an activity might impact upon the riparian zone, the 500 year flood plain, or visuals as viewed from the river.
7. Scoping Deficiency/Blind Spot Concern. While "fishing" is mentioned in this EA as one form of recreation occurring within the area covered, the EA seems curiously restrained

Clayton Johnson

Comments: Environmental Assessment DOI-BLM-UT-GO10-2017-0028-EA

in regard to other forms of recreational water use. The Persons/Organizations consulted (EA, 5.1) do not include any river runners or watersports spokespersons. I finally found a couple of brief references to river floating in Appendix E (pg 201, paras 3 & 4). Therefore, I offer this comment to help fill what appears to me a deficiency of this EA. As page 201 implicitly recognizes, water-based recreation is occurring along the Green River, from one end of the EA area to the other. Some river runners, the raft & kayak crowd, addicted to adrenaline highs, will say that the Green between Split Mountain and Desolation Canyon is boring...no rocks, no rapids, just a quiet old river flowing along. However, they fail to consider the requirements of numerous, less boisterous boaters, paddling their canoes, rowing their little fishing boats, using a little outboard motor, folks with wooden or lightweight aluminum boats, and increasingly, folks on one-person float boards of various types. I have yet to see a standing paddleboarder on the river, but I expect to, any day. These flat-water recreationists (and I am one) depend on and enjoy river segments that lack rapids, lurking rocks and the like. Since these forms of river use are (as yet) unregulated, usage is quiet, and often goes unnoticed. Simple observation (backed by statistics) shows that our public lands and waters receive ever-increasing use. BLM Management should include more consideration of the importance of the Green River (and other live streams in this desert country) to both current and future recreation, and be informed by the new forms of watercraft (such as paddleboards) rapidly gaining popularity. I suggest that in future EAs, the BLM seek consultation with river runners and watersports folks along with everyone else.

Thank you for your consideration of these comments, and your responses.



Clayton Johnson  
PO Box 31  
Jensen, UT 84035